IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors.1

as Bankruptcy Case numbers due to software limitations).

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

MOTION OF THE OFFICIAL COMMITTEE OF RETIRED EMPLOYEES AND ITS PROFESSIONALS REQUESTING LEAVE TO CITE A SPANISH-LANGUAGE ADMINISTRATIVE DETERMINATION AND FOR EXTENSION OF TIME TO FILE A CERTIFIED TRANSLATION

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor's respective

title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed

The Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the "Retiree Committee") and the Retiree Committee Professionals (together with the Retiree Committee, "Movants"), respectfully submit this *Motion Requesting Leave to Cite a Spanish-Language Administrative Determination and an Extension of Time to File a Certified Translation* (the "Motion").² In support of this Motion, Movants state:

PRELIMINARY STATEMENT

- 1. Contemporaneously herewith, Movants filed their Motion to Compel to Puerto Rico
 Department of Treasury to Comply with the First and Second Amended Orders Setting Procedures
 for Interim Compensation and Reimbursement of Expenses of Professionals ("Motion to
 Compel").
- 2. The Motion to Compel cites Determinación Administrativa Núm. 13-14, Aclaración al alcance de la imposición de la aportación especial bajo la ley Núm.48-2013 (Aug. 28, 2013) (available in Spanish at http://www.hacienda.pr.gov/sites/default/files/publicaciones/2014/05/13-14.pdf) ("Determination 13-14"), and attaches an unofficial English translation of Determination 13-14 as Exhibit C.
- 3. Movants were unable to obtain a certified English-language translation of Determination 13-14 prior to today's filing.
- 4. Accordingly, Movants seek leave from this Court to rely on the unofficial English translation of Determination 13-14, and request an extension of seven days, to and including September 21, 2021, to file a certified English-language translation of Determination 13-14 in accordance with Local District Rule 5(c).

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² All capitalized terms not defined herein shall have the meanings ascribed to them in the Motion to Compel, defined below.

WHEREFORE, the Retiree Committee and the Retiree Committee Professionals respectfully request entry of an Order, substantially in the form attached hereto as **Exhibit A**, (a) authorizing Movants to rely on Determination 13-14, (b) extending the time for Movants to file a certified English-language translation of Determination 13-14 to and including September 21, 2021, and (c) granting to Movants such other relief as may be just.

September 14, 2021

JENNER & BLOCK LLP

By:

/s/ Robert Gordon

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BENNAZAR, GARCÍA & MILIÁN, C.S.P.

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